

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Kevin M Bove

Debtor(s)

Navy Federal Credit Union, or its Successor or  
Assignee

Movant

vs.

SCOTT F. WATERMAN (Chapter 13), Trustee  
Kevin M Bove

Respondent(s)

Chapter 13

Bankruptcy No. 20-10799-amc

**CERTIFICATION OF DEFAULT**

I, Andrew M. Lubin, attorney for Navy Federal Credit Union, or its Successor or Assignee, in accordance with Settlement Stipulation approved by the Court June 22, 2022 and attached hereto as Exhibit "A", hereby certify the following:

1. That Debtor, Kevin M Bove has failed to maintain payments as described in said Settlement Stipulation.
2. That a Notice of Default was served upon Debtor and Debtor's counsel by United States Mail, first class, postage prepaid, on May 8, 2023; a true and correct copy of such Notice is attached hereto, made a part hereof, and marked as Exhibit "B"
3. That ten (10) days have elapsed, and Debtor has failed to cure the delinquency.
4. That upon filing this Certification, in accordance with the Settlement Stipulation, an Order shall be entered granting Navy Federal Credit Union, or its Successor or Assignee relief from the automatic stay to foreclose its mortgage and, without limitation, to exercise any other rights it has under the mortgage or with respect to Debtor(s)' property located at 3623 Gaul Street, Philadelphia, Pennsylvania 19134.

/s/ Andrew M. Lubin, Esquire  
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ANDREW M. LUBIN, ESQUIRE ID # 54297  
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